

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

GLADYS ORTIZ RODRIGUEZ

Debtor

CASE 12-06317 MCF

CHAPTER 13

BPPR'S REPLY TO TRUSTEE'S OBJECTION TO CLAIM # 4

TO THE HONORABLE COURT:

Comes now, BANCO POPULAR DE PUERTO RICO ("BPPR"), servicing agent for Banco de la Vivienda, secured creditor, represented by the undersigned attorney who respectfully pray and state as follows:

1. That on March 6, 2013 BPPR filed secured claim number 4 in the aggregate amount of \$25,075.00.
2. That on March 7, 2013 the Chapter 13 Trustee filed an objection to claim number 4 alleging that BPPR failed to include evidence of endorsement on the note to demonstrate its right to receive payments under the plan.
3. That the appearing secured creditors opposes to the objection to claim number 4.
4. That BPPR filed a claim that amends or supersedes claim number 4.
5. That in the amended claim BPPR also filed copy of the documents listed below:
 - a. The mortgage note in the amount of \$25,000.00 to the order of Popular mortgage, Inc., duly endorsed to the order of Puerto Rico Housing Finance Authority (known in Spanish as Banco de la Vivienda);
 - b. Mortgage deed number 615 of October 29, 2010 before Notary Public Rafael Malave Negrón;
 - c. Copy of the webpage of the Registry of the Property showing that the deed above has been duly recorded at the Registry of Property of Humacao (Las Piedras).

6. That the claim filed by BPPR on this date amends or supersedes claim number 4 and provides to the objecting party evidence of the authorization to service the perfected security interest and of BPPR's capacity to claim the same.

7. That the amended claim complies with the provisions of Rule 3001(d) and (e) and 3002.1 of the Federal Rules of Bankruptcy Procedures.

WHEREFORE BPPR respectfully requests from this Honorable Court that an order be entered denying the objection filed by the Chapter 13 Trustee and allowing the claim as filed.

In San Juan, Puerto Rico this 17th day of April, 2013.

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that on even date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following to: Debtor's attorney Roberto Figueroa Carrasquillo, Esq. and Chapter 13 Trustee Alejandro Oliveras Rivera.

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